



From the desk of:
James M. Kramer, Esq.

April 20, 2023

VIA ECF

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re. *Gref v. Am. Int'l Indus., et al.*, 20-cv-05589

Dear Judge Figueredo,

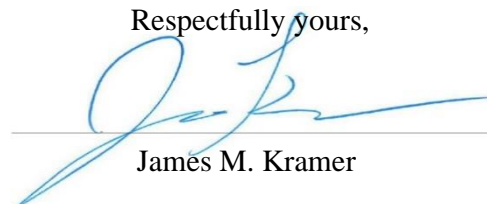
Plaintiff writes in accord with the Court's request for a joint update on the status of discovery since the parties' last update, as well as anticipated next steps in the upcoming month.

With respect to the recently discovered bottle of Clubman talc, Plaintiff has continued to offer Defendant its share of the contents of the bottle for testing, and awaits details from Defendant confirming same. AII is coordinating with its experts on the logistics of taking possession of the Clubman container from MAS laboratories. Additionally, Plaintiff's mother and stepfather, who discovered the bottle in their garage, will be deposed next week on matters related to the recently disclosed container of Clubman talc. To the extent that AII claims any further fact depositions are required on this issue beyond Plaintiff's mother and stepfather, the parties will meet and confer in an effort to address any issues.

In the upcoming month, the parties expect that their respective experts will complete their analysis of the contents of Clubman talc produced in this case, which will be followed by certain expert depositions concerning their testing/analysis and related issues. Additionally, the parties stand ready to address other scheduling matters, including whether Defendants are entitled to a continuation deposition of Dr. Jacqueline Moline and any additional deposition dates, which will be determined in accordance with this Court's anticipated ruling on this issue.

As always, we are available at Your Honor's convenience if the Court has any questions or would like additional information.

Respectfully yours,



James M. Kramer

cc: All Counsel of Record (via ECF)

We stand for our clients.

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